

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
V.)	CASE NO. 04-10307-WGY
)	
STEPHEN DEROSA)	
_____)	

MOTION FOR FUNDS FOR
INDEPENDENT PRIVATE INVESTIGATOR

Now comes Stephen DeRosa, the accused in the above-entitled matter, and respectfully moves this Honorable Court to authorize at this time the payment of funds, not to exceed Three Thousand and 00/100 Dollars (\$3,000.00) at the rate of Seventy-Five and 00/100 (\$75.00) per hour, for the independent licensed investigator – Robert K. Fawcett of National Security Services, Inc. or his equivalent – to be retained by the accused to locate, interview and serve subpoenas on witnesses related to this matter.

In support thereof, the accused states as follows:

1. The Government has done extensive research and investigation on this case, and it is necessary for the accused to conduct his own research, analysis and investigation and secure the appearance of all potential witnesses. Accordingly, this request for funds is fair and reasonable and the information sought is necessary and material to the proper development of his defense.
2. The accused is indigent and without funds to retain his own investigator. He is represented by appointed counsel and has been determined to be indigent by this Court.

3. Mr. Fawcett is a duly licensed and experienced private investigator in the Commonwealth of Massachusetts. He is been an approved private investigator by the Committee for Public Counsel Services.

Respectfully submitted for,
Stephen DeRosa, by his Attorney,

/s/ Eugene Patrick McCann

Eugene Patrick McCann, BBO #327400
Manzi and McCann
59 Jackson Street
Lawrence, Massachusetts 01840
Tel. (978) 686-5664

DATED: August 23, 2005

CERTIFICATE OF SERVICE

I, Eugene Patrick McCann, counsel for Stephen DeRosa, certify under the pains and penalties of perjury, that I have on this 23rd day of August, 2005, served a copy of the foregoing to be delivered by electronic filing to:

AUSA Paul R. Moore
Office of the United States Attorney
U.S. Courthouse, Suite 9200
One Courthouse Way
Boston, Massachusetts 02210

/s/ Eugene Patrick McCann

Eugene Patrick McCann